

1 ORRY P. KORB, County Counsel (S.B. #114399)
JOHN L. WINCHESTER, III, Deputy County Counsel (S.B. #142175)
2 OFFICE OF THE COUNTY COUNSEL
70 West Hedding Street, East Wing, Ninth Floor
3 San Jose, California 95110-1770
Telephone: (408) 299-5900
4 Facsimile: (408) 292-7240

5 Attorneys for Defendants
COUNTY OF SANTA CLARA and Its
6 Santa Clara Valley Medical Center,
PAUL ESTESS AND ANNA HUGHES
7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 HUIMIN SONG,
12 Plaintiff,
13 v.
14 COUNTY OF SANTA CLARA; SANTA
CLARA VALLEY MEDICAL CENTER; PAUL
15 ESTESS, ANNA HUGHES; and Does 1 through
70,
16 Defendants.
17

No. 12-CV05848 RMW

AMENDED
STIPULATION AND ORDER ENLARGING
TIME FOR DEFENDANTS TO RESPOND
TO PLAINTIFF'S FIRST AMENDED
COMPLAINT AND CONTINUANCE OF
CASE MANAGEMENT CONFERENCE

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 The parties, through their respective counsel of record, hereby stipulate and agree to an order
2 enlarging time, until June 16, 2013, for Defendants County of Santa Clara and its Santa Clara Valley
3 Medical Center, Paul Estess and Anna Hughes to file and serve a response to the First Amended
4 Complaint of Plaintiffs Huimin Song. The First Amended Complaint was served on March 13,
5 2013.

6 Good cause exists for this enlargement of time (30 additional days). Song and the County of
7 Santa Clara are involved in litigation in the matter of *Huimin Song and Andy Xie v. County of Santa*
8 *Clara, Santa Clara Valley Medical Center, et. al.*, Case No. CV11-04450, pending before United
9 States District Judge Edward J. Davila. The parties have been engaged in private mediation since
10 January 16, 2013 with mediator Kael Briski of the Briski Mediation Group. Since the initial
11 mediation on January 16, the parties and Mr. Briski have had countless email communications, two
12 face to face discussions and no less than twelve phone conferences. Settlement demands, offers and
13 terms of resolution have been exchanged. The parties are in the process of scheduling another
14 mediation session on Friday, May 17, 2013 at 9:30 a.m.. The settlement discussions have involved
15 resolution of all issues, including the allegations giving rise to this lawsuit, between Song and the
16 County. In view of the time and effort that will be necessary to prepare an appropriate responsive
17 pleading, and the impending mediation session which the parties are hopeful will end both lawsuits,
18 the parties respectfully request an order enlarging Defendants time to respond to the First Amended
19 Complaint. Furthermore, the parties request that the Case Management Conference be continued to
20 Friday, June 28, 2013, 10:30 a.m.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

I hereby attest that I have on file the holograph signature indicated by a "conformed" signature (/S/) within this e-filed document.

IT IS SO STIPULATED

Respectfully submitted,

LAW OFFICES OF
BONNER & BONNER

Dated: March 26, 2013

By: _____/S/

CHARLES A. BONNER, ESQ.
Attorney for Plaintiff
HUIMIN SONG

ORRY P. KORB
County Counsel

Dated: March 26, 2013

By: _____/S/

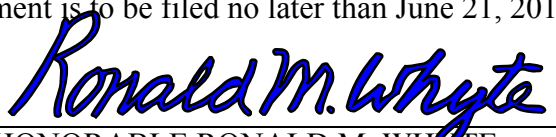
JOHN L. WINCHESTER, III
Deputy County Counsel

Attorneys for Defendant
COUNTY OF SANTA CLARA and Its
Santa Clara Valley Medical Center,
PAUL ESTESS AND ANNA HUGHES

ORDER

Defendants may have to and including June 16, 2013 by which to file and serve a response to Plaintiff's First Amended Complaint. The Case Management Conference is continued to June 28, 2013, 10:30a.m.. The Joint Case Management Statement is to be filed no later than June 21, 2013.

Dated: _____
[Signature]


HONORABLE RONALD M. WHITE
United States District Court Judge